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February 24, 2012

VIA UPS OVERNIGHT

The Honorable Dickinson R. Debevoise
United States District Court Judge
District of New Jersey
Martin Luther King, Jr. Federal Bldg. & Courthouse
50 Walnut Street, Room 5083
Newark, NJ 07101-0999

Re: *Ramon Reyes v. Keith Machinery Corp., et al.*
Civil No. 09-5309 (DRD)

Dear Judge Debevoise:

Pursuant to your letter of Feb. 3, 2012 (with attachments) I am responding on behalf of the "Littleford" defendants to your offer for parties to submit comments and proposed revisions to your: 1) Statement to the Jury Panel; 2) written questionnaire; and 3) Preliminary Jury Instructions. These proposed comments and revisions are attached to this letter.

In addition I wanted to make one request to the Court and also advise the Court of a scheduling matter. First, I would ask permission to try this case alone. We have used Michael Kunsch and his firm, Sweeney and Sheehan, as local counsel in this case. However I have participated fully as national counsel for Makino (designated by the Court and pleadings as the Littleford Defendants). It would be an economic burden on these defendants to be required to have two different firms involved in this trial. I am well aware of the local rules of this Court and will continue to rely on Sweeney and Sheehan for support during the trial. Mr. Kunsch and I

The Honorable Dickinson R. Debevoise

February 24, 2012

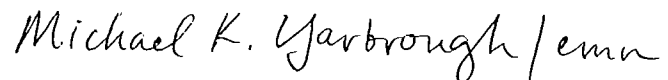
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have discussed this matter and he supports this request. I would appreciate permission to proceed in this manner.

Second, I noted in your letter and attachments that you expect that this trial would last two weeks. I would like to advise the Court that I have long-standing non-refundable tickets to Europe for a departure on May 2nd. While that is outside of the 2 week time-frame you have estimated, I thought it prudent to let this Court know of that restriction well before the trial commenced.

Thank you for your consideration of these issues.

Very truly yours,

A handwritten signature in black ink that reads "Michael K. Yarbrough / emn". The signature is written in a cursive, flowing style.

Michael K. Yarbrough

MKY:sw

cc: Richard M. Winograd, Esq. (w/encl)
Scott L. Haworth, Esq. (w/encl)
John Michael Kunsch, Esq. (w/encl)